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The Honorable Judge Ona T. Wang
United States District Court, Southern District of New York
500 Pearl Street, Room 20D
New York, NY

RE: 23-cv-10780 (ALC) (OTW)
23-cv-11057 (ALC) (OTW)
First letter motion seeking extension of time for discovery

Dear Honorable Judge Wang:

Plaintiff's counsel respectfully submits this letter seeking an extension of time to complete discovery which is currently scheduled to end on June 7, 2025. In plaintiff's Initial Disclosure, plaintiff's counsel identified injuries to plaintiff's cervical and lumbar spines. In item No. 13 of the Rule 26(f) case management plan, and during the initial conference with the Court plaintiff's counsel advised the Court that since this was a worker's compensation case, there would likely be delays in plaintiff's treatment. Just as anticipated the delays are upon us. There have been no prior requests for any extensions of time. There are no objections to this request.

Plaintiff has done nothing to cause any delay. She timely underwent conservative treatment. On December 12, 2023, she underwent an MRI to her neck. When the conservative treatment failed, she met with spine surgeons. She initially met with Dr. Merola on February 5, 2024 with a few follow-ups thereafter. She then got a second opinion on November 11, 2024, and then again on March 31, 2025 – both from the same second doctor. At about that second visit, the spine surgeon requested another round of cervical MRIs. Unfortunately, worker's compensation denied the request for another MRI of her neck. This is not uncommon with worker's compensation matters which usually require appeals and/or escalations for the initial denial to be reviewed. I have been advised by plaintiff's worker's compensation attorney that this process could take another 45-60 days for her to get the MRI approved.

Ms. Jackson has already advised me that she is definitely interested in undergoing neck surgery once it gets approved via worker's compensation. As such, plaintiff requests an extension of 90 days to the close of fact discovery. Neither side will suffer any prejudice by this extension. Since this case has been assigned to your Honor, the parties have been moving the case forward and have gotten through all depositions and exchanged all documentary evidence (except for the policies from defense counsel which are expected shortly).

Very truly yours,
/s/ Mehmet F. Gokce
Mehmet F. Gokce

Application **GRANTED**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Ona T. Wang', written over a horizontal line.

Ona T. Wang
U.S.M.J. 6/4/2025